

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

DIANNA STRINGHAM,	)	
	)	
Plaintiff,	)	
	)	
<i>vs.</i>	)	Cause No. 1:22-cv-00817-TWP-MG
	)	
CARMEL CLAY SCHOOLS; and	)	
BOARD OF SCHOOL TRUSTEES	)	
OF CARMEL CLAY SCHOOLS,	)	
	)	
Defendants.	)	

**PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE  
TO FILE AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 15(a)(2), Plaintiff, Dianna Stringham, by counsel, hereby moves for leave to file her Amended Complaint against Defendants Carmel Clay Schools and Board of Trustees of Carmel Clay Schools. In support of this *Unopposed Motion*, Mrs. Stringham state as follows:

1. Because Mrs. Stringham has now completed her requirement to exhaust her administrative remedies, and because the EEOC issued its Notice of Right to Sue, Mrs. Stringham now seeks to amend her *Complaint for Damages and Demand for Trial by Jury* [Dkt. [1](#)] (“Initial Complaint”) to add allegations of Title VII discrimination and retaliation.
2. On April 27, 2022, Mrs. Stringham filed her *Complaint for Damages and Demand for Trial by Jury*. [Dkt. [1](#)].
3. On July 7, 2022, this Court approved a Case Management Plan (“CMP”) for this matter. [Dkt. [20](#)].

4. The CMP states: “Plaintiff anticipates that she will amend the complaint to bring a Title VII claim upon exhaustion of administrative remedies before the EEOC and Defendant has already been advised of this fact.” [Dkt. [20](#) at 9].

5. Therefore, both this Court and Defendants are aware of the potential amendments to the Initial Complaint.

6. As provided in the CMP, the deadline for amending the pleadings and/or to join additional parties in this matter is September 27, 2022. [Dkt. [20](#) at 4].

7. Mrs. Stringham’s Motion is therefore timely under the provisions of the CMP.

8. Rule 15(a)(2) of the Federal Rules of Civil Procedure states that in requests for amending pleadings, “[t]he court should freely give leave when justice so requires.”

9. No prejudice will accrue to Defendants with these amendments due to their prior knowledge of facts and allegations contained in the proposed amendments.

10. Counsel for Mrs. Stringham sent a copy of the redlined Amended Complaint to counsel for Defendants and inquired about any objections to this Motion. Counsel for Defendants indicated that Defendants do not object to Mrs. Stringham’s Motion.

WHEREFORE Mrs. Stringham respectfully requests leave to file her Amended Complaint attached hereto as Exhibit A, and further requests all other just and proper relief.

Respectfully submitted,

s/ Jamie A. Maddox

Sandra L. Blevins, Atty. No. 19646-49

Jamie A. Maddox, Atty. No. 26522-49

Chad H. Holler, Atty. No. 35253-49

*Attorneys for Plaintiff Dianna Stringham*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 13, 2022, a copy of the foregoing was served by electronic filing. Notice of this filing will be sent to all parties of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/ Jamie A. Maddox

Jamie A. Maddox

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